

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.

Tyreece Dupree PITTS

Case: 2:22-mj-30300  
Case No.  
Assigned To : Unassigned  
Assign. Date : 7/7/2022  
USA V. PITTS (CMP)(CMC)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2, 2022 in the county of Washtenaw in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: July 7, 2022

City and state: Detroit, Michigan



*Complainant's signature*

Special Agent Michael Parsons - ATF

*Printed name and title*



*Judge's signature*

Honorable Kimberly G. Altman, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Michael S. Parsons, being duly sworn, do hereby state the following:

**I. INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a Special Agent since September of 2000. I have been involved in numerous investigations regarding firearms, firearms licensing, and narcotic laws resulting in successful federal prosecutions.

2. The statements contained in this affidavit are based on my personal knowledge, my review of written police reports by the Washtenaw County Sheriff's Office (WCSO), and information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter. This affidavit does not provide all the information known to law enforcement about this investigation. This affidavit provides information necessary to establish probable cause that Tyreece Dupree PITTS (XX/XX/2004) has violated 18 U.S.C. § 922(g)(1) – Possession of a Firearm by a Convicted Felon.

## **II. PROBABLE CAUSE**

3. On July 02, 2022, at approximately 11:39 am, WCSO Deputies were conducting covert surveillance in Ypsilanti Township, Michigan when they recognized Tyreece PITTS exit a residence and get into the passenger seat of a black Mercedes sedan with an expired Ohio plate. Deputies recognized PITTS from previous investigations and professional contacts. Deputies also knew that PITTS was recently released from jail on June 19, 2022, was currently on probation and that he had a bench warrant for Stolen Property out of Kalamazoo, Michigan.

4. WCSO Deputies followed the black Mercedes away from the residence. Once it turned north onto Burton Court from Harriet Street the Deputies conducted a traffic stop on the vehicle due to the expired license plate and PITTS' warrant. PITTS was ordered out of the vehicle and placed into handcuffs. Recovered from PITTS' left front pants pocket was a Remington 380. caliber pistol.

5. A criminal history check was conducted on PITTS, which revealed that he has been convicted of the following felonies:

- a. On April 12, 2016, PITTS plead guilty in Washtenaw County 22<sup>nd</sup> Circuit Court to one count of Assault with Dangerous Weapon.
- b. On April 12, 2016, PITTS plead guilty in Washtenaw County 22<sup>nd</sup> Circuit Court to one count of Breaking & Entering a Building with Intent.
- c. On March 23, 2022, PITTS plead guilty in Washtenaw County 22<sup>nd</sup> Circuit Court to one count of Weapons Carrying Concealed, one count of Stolen Property Receiving and Concealing – Motor Vehicle, one count of Malicious Destruction Fire/Police Property and one count of Police Officer Assaulting/Resisting/Obstructing.

6. PITTS' felony convictions in each of the above cases were obtained by guilty plea or plea of nolo contendere. I am aware that the Michigan Court Rules require a court to directly advise a defendant of the maximum possible penalty before accepting a guilty plea or plea of nolo contendere. Therefore, probable cause exists that PITTS knew, at the time he possessed the firearm, he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

7. Affiant is an expert in the Interstate Nexus of Firearms. The Remington Model RM380, 380 caliber pistol, recovered from PITTS, was manufactured outside the State of Michigan, thereby travelling in interstate commerce.

### III. CONCLUSION

8. Probable cause exists that Tyreece Dupree PITTS, in Washtenaw County, located in the Eastern District of Michigan, knowingly possessed the above-described firearm: said firearm having traveled in interstate commerce; in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Michael S. Parsons, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means



HONORABLE KIMBERLY G. ALTMAN  
UNITED STATES MAGISTRATE JUDGE

Date: July 7, 2022